

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF WYOMING

UNITED STATES OF AMERICA
Plaintiff

V.

RONALD OSTROM
Defendant

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Case No. 2:22CR000060-01F

To: The clerk of court and all parties of record

MOTION FOR EXTENSION OF TIME FILE A NOTICE OF APPEAL

Pursuant to F.R.A.P. 4(a)(5), Ronald Ostrom, Defendant, respectfully requests leave to file the within notice of appeal out of time. Defendant Ostrom desires to appeal the judgment in this action entered on February 20, 2024, but failed to file a notice of appeal within the required number of days because:

1. The Defendant was convicted after a jury trial in which he was represented by Attorney Ryan Healey.
2. The felony information contained 15 counts, of which he was found not guilty on counts 5,8,9, 10, 11 12, 13, and 14. Defendant was found guilty on counts 1, 2, 3, 4, 6 and 7.

3. After the jury trial, the Defendant contacted Attorney Tim Blatt and Sam Krone indicating that he wanted to appeal his conviction and issues that occurred shortly before trial and during the trial.

4. After consultation, the Defendant decided to continue with Attorney Healey through sentencing since he was more familiar with the case and in a better position to argue sentencing.

5. Attorney Blatt and Krone contacted Attorney Healey and advised them of their likely involvement in an appeal but that the Defendant would continue with Attorney Healey's representation through sentencing. Attorney Healey agreed with this arrangement and represented the Defendant through sentencing on February 20, 2024.

6. Attorney Krone, pursuant to a conversation with Attorney Healey understood that Attorney Healey would forward a copy of the final sentencing order once he received the same.

7. Attorney Krone received the email on February 20, 2024 final Order on March 6, 2024, two days after the time for filing an appeal had run.

8. Attorney Blatt and Krone contacted the Plaintiff, through Assistant U. S. Attorney, Michael Elmore. The Plaintiff had no objection to the Defendant's request for an extension.

9. Attorneys Tim Blatt and Sam Krone have filed with this Motion their entry of Appearance.

Date: 3/11/2024



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